



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

October 9, 2012

Candace McKinley
Environmental Program Manager
Bureau of Reclamation, Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901

Re: U.S. Environmental Protection Agency (EPA) Comments on the final Environmental Impact Statement (FEIS) for the Odessa Subarea Special Study. EPA Project Number: 08-054-BOR.

Dear Ms. McKinley:

The EPA has reviewed the **Odessa Subarea Special Study** in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs the EPA to review and comment in writing on the environmental impacts and level of disclosure associated with all major federal actions.

The FEIS was prepared in cooperation between the Bureau of Reclamation and the Washington Department of Ecology to examine the feasibility and environmental consequences of alternatives to replace groundwater used for irrigation in the Odessa Ground Water Management Subarea (Odessa Subarea) with Columbia Basin Project (CBP) surface water. The FEIS identifies Alternative 4b-modified partial replacement as the agency preferred alternative and the environmentally preferred alternative.

The EPA raised environmental concerns on the draft EIS regarding feasibility of alternatives, water availability, water conservation practices, groundwater quality, and mitigation measures. We appreciate the response to comments on each of the issues we identified. Specifically, we are encouraged by the following additional information:

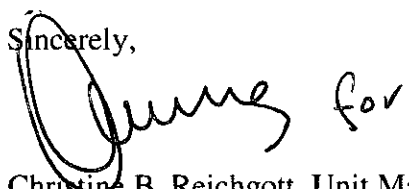
- the development of two new alternatives (Alternatives 4A and 4B modified partial replacement alternatives), which provide the most benefits to the aquifer with the least impacts to other environmental resources as compared to the partial and full replacement alternatives;
- the discussion of conservation efforts and Coordinated Conservation Program;
- the consideration of recently available study (2010 USGS report) to validate pumping depths and rate of decline between 1984;
- the added level of detail on environmental commitments (BMPs) and responsible authorities; and
- the inclusion of Figure 3-6 to illustrate groundwater wells and wellhead protection zones.

This additional information and responses resolve our concerns. However, we continue to encourage the Bureau of Reclamation to consider groundwater quality during implementation and for future monitoring. In our comments on the draft EIS, we identified a concern related to groundwater quality and the quality of recharge given the existence of contamination by nitrates, bacteria, other contaminants

in parts of the Columbia Basin. The response to our comment noted that this EIS is not a groundwater recharge study and therefore, did not analyze these impacts. We acknowledge the focus on surface water withdrawal. However, we believe that groundwater quality is an important issue when considering recharge within the basin. In order to promote the quality of surface and ground water resources, we encourage the Bureau of Reclamation to continue partnering with agencies and engage in comprehensive monitoring of Columbia Basin surface and groundwater.

Thank you for this opportunity to comment on the FEIS. If you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Lynne McWhorter of my staff at (206) 553-0205 or by electronic mail at mcwhorter.lynne@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine B. Reichgott", followed by the word "for" in a cursive script.

Christine B. Reichgott, Unit Manager
Environmental Review and Sediment Management Unit